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*Counsel for Plaintiffs*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re:  
MOSDOS CHOFETZ CHAIM INC.,  
  
Debtor.

Chapter 11 – Post Confirmation

Case No. 12-23616 (SHL)

CONGREGANTS OF MOSDOS CHOFETZ CHAIM  
INC. A/K/A KIRYAS RADIN,  
  
Plaintiffs,

- against -

Adv. Proc. No. 21-7023 (SHL)

MOSDOS CHOFETZ CHAIM INC., CHOFETZ  
CHAIM INC., TBG RADIN LLC, SHEM OLAM,  
LLC, CONGREGATION RADIN DEVELOPMENT  
INC., ARYEH ZAKS, BEATRICE WALDMAN  
ZAKS, MENDEL ZAKS, GITTEL ZAKS LAYOSH,  
ELIYAHU LAYOSH, SAMUEL MARKOWITZ,  
DEBORAH ZAKS HILLMAN, YOM T. HENIG,  
STEVEN GREEN, DANIEL GREEN, ABRAHAM  
ZAKS and STERLING NATIONAL BANK,

Defendants.

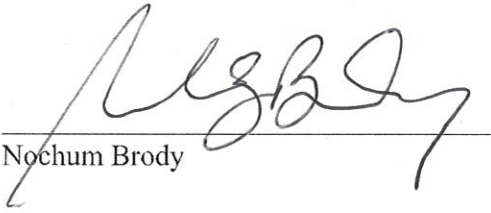
**DECLARATION OF  
NOCHUM BRODY**

Nochum Brody, under penalty of perjury and pursuant to 28 U.S.C. § 1746, submits this  
declaration in support of Movant's Order to Show Cause,

1. I am among the Movants who are presently seeking to extend the stay of the Court's prior  
order in this matter, which directed the eviction of me and numerous of my family  
members from their homes located on Kiryas Drive (a/k/a/ 1-60 Kiryas Radin Drive), in  
Spring Valley, Rockland County, New York.

2. I make this declaration based upon my personal knowledge and in response to certain false accusations asserted by Henoch Zaks in opposition to the Movants' request for an extended stay.
3. In his declaration, Henoch states that I "harassed a worshipper on the CRDI property for approximately thirty minutes to attempt to stop in from praying and studying in the CCI building and pressuring him not to pay rent for his housing unit." Declaration of Henoch Zaks, dated September 5, 2022, ¶ 2 n.1. That is a false statement.
4. I was recently approached by Yehudah Rusak, who asked if I was Nochum Brody. When I said yes, he asked to meet with me in person. I responded that I would be available to meet with him at my home.
5. Mr. Rusak later came to my home, where we discussed at some length the goings-on in Kiryas Radin. We also discussed the Halakhik (religious) law regarding our occupancy at Kiryas Radin, which *Mr. Rusak* inquired about.
6. I did not in any way harass or intimidate him, and I am convinced that Mr. Russak would agree. He left my home on a very cordial note.

Dated: Monsey, New York  
~~September~~ May 8, 2022

  
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Nochum Brody